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January 24, 2024

VIA ECF

Honorable Jessica G. L. Clarke
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Re: *Parker v. Bursor et al.*, Case No. 24-cv-245 (JGLC) (RFT)

Dear Judge Clarke:

I represent the Defendants in the above-referenced action.

Pursuant to Section 2(a) of Your Honor's Individual Rules and Practices in Civil Cases, I write for the purpose of seeking an emergency stay of the Report and Recommendation issued today by Magistrate Judge Tarnofsky (Doc. No. 25), recommending that Your Honor, with one limited exception, deny Defendants' motion for a Temporary Restraining Order and Preliminary Injunction. Defendants seek the stay so that they can either (a) file timely Objections to the Report and Recommendation, or (b) if Your Honor concludes that a stay should not be granted, seek an emergency stay from the Court of Appeals.

Defendants further seek an Order directing the Clerk to redact those portions of pages 3-4 and 9 of Magistrate Tarnofsky's Report and Recommendation which detail the allegations which Defendants expect Plaintiff to make in her Complaint because Magistrate Tarnofsky's Report and Recommendation provides that Defendants' motion is to remain under seal. *Id.* at p. 12.¹

Plaintiff has informed me that she is available tomorrow afternoon after 2:30 p.m. and I respectfully ask that the Court hear us thereafter at its earliest convenience because Plaintiff has

¹ This request may be rendered moot because, after seeing the Report and Recommendation, I first wrote to Magistrate Tarnofsky asking that the Clerk make these redactions.

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refused Defendants' offer to extend the time for the filing of her Complaint and instead is insisting that she will file it on Wednesday, January 31.

Respectfully yours,

/s/ Judd Burstein

Judd Burstein

cc: Angelica Parker, Plaintiff *Pro Se* (via email and hand delivery)